

**REMARKS**

Reconsideration and allowance of this application are respectfully requested. Claims 2, 8, 14, 21-32, 34-35 and 37-38 are cancelled. Claims 1, 3-7, 9-13, 15-20, 33, 36 and 39-41 remain in this application and, as amended herein, are submitted for the Examiner's reconsideration.

In the Office Action, claims 1, 3-7, 9-13, 15-20, 33, 36, and 39-41 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Naoi (U.S. Patent No. 6,683,617) in view of Marugame (U.S. Patent No. 5,995,649). Applicants submit that the claims are patentably distinguishable over the cited references.

The Examiner asserts that the Marugame patent teaches an extracting means and that it would have been obvious to one of ordinary skill in the relevant art to incorporate the teachings of Marugame into the Naoi patent. Marugame, however, is not concerned with antialiasing whereas Naoi describes (i) sorting according to the scanning lines *of an entire image* and then rendering the entire image so that sub-pixel masks required for antialiasing *are created for each pixel of the image*, (ii) texture mapping and shading the entire image to create pixel data *for each pixel of the image*, and (iii) antialiasing *each pixel of the image* using the sub-pixel masks and the pixel data. (See, e.g., Figs. 1 and 7; col. 5, line 63 - col. 6, line 2; and col. 7, line 60 - col. 8, line 6). A person of ordinary skill in the relevant art would not look to use the sorting/rendering operation described by Naoi and then use Naoi's described antialiasing for only some of the pixels because Naoi's sorting/rendering operation would needlessly create sub-pixel masks for both the pixels that are to be antialiased *and the pixels that are not antialiased*. Because Naoi's sorting/rendering operation requires four-circuit parallel processing because of the increased apparatus scale and

increased processing time (see col. 7, lines 43-47), the generation of sub-pixel masks that are not used is both inefficient and wasteful of valuable processing capability. Therefore, the ordinary practitioner would not look to combine the teachings of Naoi and Marugame in the manner asserted by the Examiner.

Neither Naoi nor Marugame discloses or suggests:

antialiasing means for antialiasing only the extracted data to form an antialiased image portion associated with the visually important line part by generating respective pluralities of second pixel values for each pixel in the visually important line part so that a given one of the pluralities of second pixel values is associated with a specific one of the pixels in the visually important line part

as called for in claim 1.

The Examiner also contends that Naoi teaches an antialiasing means and refers to the Abstract and col. 11, lines 40-50, and the Examiner contends that Naoi teaches an overwriting means and refers to block 105 of Fig. 7, namely, the integration/selection circuit. However, Naoi describes a blending circuit that achieves sub-pixel based antialiasing (see col. 5, line 66 - col. 6, line 2; col. 8, lines 1-6; and col. 11, lines 27-30) and describes the integration/selection circuit as *part of the blending circuit* (see Fig. 7; and col. 8, lines 7-12). Thus, the integration/selection circuit *is part of the circuit that carries out the sub-pixel based antialiasing*. Naoi does not disclose or suggest that the integration/selection circuit carries out *overwriting* using the values generated by an antialiasing means.

Moreover, a person of ordinary skill in the relevant art would not find any teaching or suggestion in Naoi to use the integration/selection circuit for overwriting. Naoi describes that the integration/selection circuit *combines* sub-pixel mask sets that correspond to the same color data to for *integration*

into a single color data and pixel mask set and then selects four such color and mask sets. (See Fig. 9; and col. 10, lines 8-12 and 19-32). Thus, the corresponding sub-pixel mask sets are combined by the integration/selection circuit. Naoi does not disclose or suggest that the integration/selection circuit overwrites by using one of the sub-pixel mask sets to replace another sub-pixel mask set.

Neither Naoi nor Marugame discloses or suggests:

overwriting means for overwriting by using the pluralities of second pixel values associated with each pixel of the visually important line part to replace the pluralities of first pixel values associated with each pixel of the visually important line part thereby at least reducing the aliasing of the portion of the rendered image

as recited in claim 1.

It follows that neither Naoi nor Marugame, whether taken alone or in combination, discloses or suggests the image rendering apparatus defined in claim 1. Therefore, claim 1 is patentably distinguish and unobvious over the cited references.

Claims 3-6 depend from claim 1, and each further defines and limits the invention set out in the independent claim. It follows that each of claims 3-6 defines a combination that is patentably distinguishable over the cited references for at least the same reasons.

Independent claim 7 is directed to an image rendering method that includes limitations similar to those set out in claim 1. It follows that claim 7 is patentably distinguishable over Naoi and Marugame at least for the reasons set out above regarding claim 1.

Claims 9-12 depend from claim 7 and are therefore each distinguishable over the cited references for at least the same reasons.

Independent claim 13 is directed to a computer-readable storage medium having a computer program stored therein for operating an apparatus to perform the image rendering method defined in claim 7. Claim 13 is therefore patentably distinguishable over Naoi and Marugame for at least the same reasons.

Claims 15-18 depend from claim 13 and are distinguishable over the cited art at least for the same reasons.

Independent claim 19 relates to a server apparatus that includes a computer-readable storage medium similar to that defined in claim 13. Therefore, at least for the same reasons, claim 19 is patentably distinguishable over the Naoi and Marugame references.

Claim 20 defines a computer-readable storage medium having limitations similar to those set out in claim 13 and is patentably distinguishable over Naoi and Marugame at least for the same reasons.

Claim 39 depends from claim 20 and is distinguishable over the cited art at least for the same reasons.

Independent claim 33 calls for an image rendering apparatus having limitations similar to those set out in claim 1. Claim 33 is therefore patentably distinguishable over the Naoi and Marugame patents at least for the same reasons.

Claim 40 depends from claim 33 and is distinguishable over the cited references for at least the same reasons.

Independent claim 36 defines an image rendering method having limitations similar to those set out in claim 7. It follows that claim 36 is patentably distinguishable over Naoi and Marugame at least for the same reasons.

Claim 41 depends from claim 36 and is distinguishable over Naoi and Marugame for at least the same reasons.

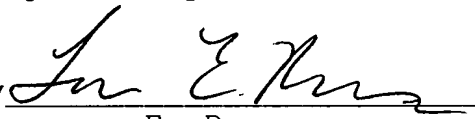
Accordingly, the withdrawal of the rejection under 35 U.S.C. § 103 is respectfully requested.

As it is believed that all of the rejections set forth in the Official Action have been fully met, favorable reconsideration and allowance are earnestly solicited. If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that the Examiner telephone applicants' attorney at (908) 654-5000 in order to overcome any additional objections which the Examiner might have.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

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Respectfully submitted,

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